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May 3, 2017

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (MG)**

**Letter Regarding Update on Related Proceeding  
And the Impact of *In re Tronox Inc.* on the 2016 Threshold Issues**

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC ("**New GM**") in the above-referenced matter. Pursuant to Judge Gerber's Endorsed Order dated May 5, 2015 [ECF No. 13131], New GM, jointly with counsel for plaintiffs (Brown Rudnick LLP and Goodwin Procter LLP), write to update the Court regarding developments in proceedings relating to New GM. Specifically, on April 24, 2017, Judge Furman entered a "text only" order authorizing the parties in MDL 2543 to file supplemental letter briefs addressing the significance of the Second Circuit's recent opinion in *In re Tronox Inc.*, Dkt. No. 16-343, 2017 WL 1403001 (2d Cir. Apr. 20, 2017) on New GM's previous motion for summary judgment on economic loss plaintiffs' successor liability claims. Attached hereto as **Exhibit "A"** and **Exhibit "B"** are, respectively, New GM's letter brief and the letter brief by Co-Lead Counsel in MDL 2543, each filed on April 27, 2017 in MDL 2543.

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Separately, the parties request that letter briefs, not to exceed four (4) pages be filed on or before May 10, 2017, to address the impact, if any, of the *Tronox* Opinion on 2016 Threshold Issue No. 2 as it relates to Independent Claims.

Respectfully submitted,

*/s/ Scott Davidson*

Scott Davidson

*/s/ Howard Steel*

Howard Steel

*/s/ William Weintraub*

William Weintraub

SD/hs  
Encl.

The request that letter briefs, not to exceed four (4) pages be filed on or before May 10, 2017, to address the impact, if any, of the *Tronox* Opinion on 2016 Threshold Issue No. 2, as it relates to Independent Claims, is GRANTED.

MEMORANDUM ENDORSED.

IT IS SO ORDERED.

DATED: 5/4/17

*/s/ MARTIN GLENN*  
UNITED STATES BANKRUPTCY JUDGE